



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 2, 2020

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: United States v. Chandler, 19 Cr. 867 (PAC)**

Dear Judge Crotty:

Following the Court's Order this morning, the Government has directed the Marshals to produce the defendant for release. The Government respectfully submits this letter to request an additional condition to the appearance bond, which is required under 18 U.S.C. § 3142(i)—that the defendant be released into the custody of another person. See 18 U.S.C. § 3142(i) (permitting “the temporary release of the person, in the custody of a United States marshal or another appropriate person”); United States v. Perez, No. 19 CR. 297 (PAE), 2020 WL 1329225, at \*1 (S.D.N.Y. Mar. 19, 2020) (designating third-party custodian).

The parties have conferred and agreed that the defendant's mother, Sandra Chandler, with whom the defendant will be living during his home incarceration, will serve as third-party custodian. The Government accordingly requests that the bond be modified to designate Sandra Chandler as the third-party custodian of the defendant during his temporary release. The defense consents.

Respectfully submitted,

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by: /s/ Jun Xiang  
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**CC** Defense Counsel (By ECF)